

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

STEPHEN SIMONI,

Plaintiff,

vs.

UNITED AIRLINES, INC.,

Defendant.

Case No. 1:21-cv-01267

Hon. John F. Kness

JOINT MOTION TO EXTEND DEADLINE FOR THE CLOSE OF FACT DISCOVERY

Plaintiff Stephen Simoni (“Plaintiff”) and Defendant United Airlines, Inc. (“Defendant” or “United”) (collectively, the “Parties”), by their undersigned attorneys, hereby jointly move to modify the current case management schedule by extending the deadline for the close of fact discovery relating to Plaintiff’s individual claim and class certification by 90 days. In support thereof, the Parties state as follows:

1. In its August 29, 2022, Order (ECF No. 37), the Court set a January 5, 2023, deadline for the close of fact discovery relating to Plaintiff’s individual claim and class certification.

2. Since then, the Parties have been working effectively together to complete fact discovery in accordance with the Court’s deadline and in advance of Plaintiff’s anticipated motion for class certification. Among other things, the parties have exchanged written discovery, responses to written discovery, and made productions of documents in response to certain of those written discovery requests.

3. Due to the upcoming holidays and certain scheduling issues presented by other cases, however, the parties do not believe they can reasonably complete fact discovery by the

current January 5, 2023 deadline. Accordingly, the Parties respectfully request a 90-day extension of the deadline for the close of fact discovery to April 5, 2023.

4. The requested extension is not sought for purposes of delay, but rather to allow the parties sufficient time to complete any remaining written discovery and to schedule and conduct any necessary depositions related to Plaintiff's individual claim and class certification.

5. The undersigned counsel for United represents that she has been authorized by Plaintiff to submit this Motion as a Joint Motion of the Parties.

WHEREFORE, the Parties respectfully request that the Court GRANT this motion and extend the current deadline for the close of fact discovery relating to Plaintiff's individual claim and class certification by 90 days, to April 5, 2023.

Dated: December 20, 2022

Respectfully submitted,

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By: Sondra A. Hemeryck

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